UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

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HUZHOU CHUANGTAI RONGYUAN
INVESTMENT MANAGEMENT
PARTNERSHIP, HUZHOU HUIHENGYING
EQUITY INVESTMENT PARTNERSHIP, and
HUZHOU HUIRONGSHENG EQUITY

: 21 Civ. 9221 (KPF)

Petitioners,

NOTICE OF PETITIONERS'

v.

INVESTMENT PARTNERSHIP,

RENEWED MOTION FOR SANCTIONS AGAINST SEIDEN

HUI QIN,

:

Respondent. :

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PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law and the declaration of Carol Lee and exhibits thereto, Petitioners Huzhou Chuangtai Rongyuan Investment Management Partnership, Huzhou Huihengying Equity Investment Partnership, and Huzhou Huirongsheng Equity Investment Partnership, through their attorneys, will move this Court at such time set by the Court, before the Honorable Katherine Polk Failla, United States District Judge, Southern District of New York, at the United States Courthouse, 40 Foley Square, Room 2103, New York, NY 10007, pursuant to the Court's April 18, 2023 decision, for an order: (i) imposing sanctions on Seiden Law LLP pursuant to Fed. R.. Civ. P. 37(b)(2), 28 U.S.C. § 1927, and the Court's inherent power; and (ii) for such other relief as may be appropriate, in law or in equity.

Dated: June 27, 2023

New York, New York PILLSBURY WINTHROP SHAW PITTMAN LLP

By: /s/ Geoffrey Sant
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Geoffrey Sant
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Attorneys for Petitioners Huzhou Chuangtai Rongyuan Investment Management Partnership, Huzhou Huihengying Equity Investment Partnership, and Huzhou Huirongsheng Equity Investment Partnership